



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

NOV 12 1997

James W. Roebuck, Treasurer  
Blue Circle America, Inc. PAC  
1800 Parkway Place, Ste. 1200  
Marietta, GA 30067

Identification Number: C00285429

Reference: Mid-Year Report (1/1/97-6/30/97)

Dear Mr. Roebuck:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report discloses a contribution(s) to Citizens for Petri for the retirement of debts incurred by the 1996 General election campaign; however, it appears that the recipient committee(s) had insufficient debts to warrant such a contribution. Please note that a committee may only designate contributions to retire a candidate's debts if those debts exist.

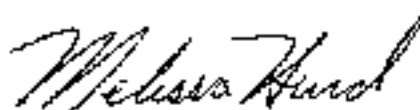
If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should either notify the recipient and request a refund of the impermissible amount and/or notify the recipient, in writing, of your redesignation of the contribution. All refunds and redesignations must be made within sixty days of the treasurer's receipt of the contribution. Refunds are reported on Line 16 of the Detailed Summary Page and on Schedule A of the report covering the period during which they are received. Redesignations are reported as memo entries on Schedule B of the report covering the period during which the redesignation is made. 11 CFR §110.2(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount deducted during each payroll period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Melissa Hurd  
Reports Analyst  
Reports Analysis Division

## PAYROLL DEDUCTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate schedule for each category of the Debited Summary Page	PAGE OF FOR LINE NUMBER 11(a)(1)
<b>Contributions from Individuals</b>			
Any information copied from such Reports and Statements may not be used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
NAME OF COMMITTEE (in Full) National Organization PAC 000000001			
A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date received (day, month, year)	Amount of Cash Received (The Report)
AMES Sullivan Rt 18th Street City, State ZIP	National Organization, Inc.	payroll deduction	\$90.00
Report for: <input type="checkbox"/> Other receipt <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation Branch Manager	Aggregate Year-to-Date > \$	(\$18 biweekly)
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date received (day, month, year)	Amount of Cash Received (The Report)
Rodney Jones 881 Hamshire Road City, State ZIP	National Organization, Inc.	payroll deduction	\$120.00
Report for: <input type="checkbox"/> Other receipt <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation Vice President	Aggregate Year-to-Date > \$	(\$20 biweekly)

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

## IN-KIND CONTRIBUTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate schedule for each category of the Debited Summary Page	PAGE OF FOR LINE NUMBER 11(a)(1)
<b>Contributions from Individuals</b>			
Any information copied from such Reports and Statements may not be used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
NAME OF COMMITTEE (in Full) National Organization PAC 000000001			
A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date received (day, month, year)	Amount of Cash Received (The Report)
Martin L. Kress 4 River Road City, State ZIP	National Organization, Inc.	8/19/84	\$3,888.00 (IN-KIND) (RAFFLE PRIZE)
Report for: <input type="checkbox"/> Other receipt <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation Chairman	Aggregate Year-to-Date > \$	3,888.00

SCHEDULE B ITEMIZED DISBURSEMENTS		Use separate schedule for each category of the Debited Summary Page	PAGE OF FOR LINE NUMBER 21(b)
<b>Operating Expenditures/Other Federal</b>			
Any information copied from such Reports and Statements may not be used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
NAME OF COMMITTEE (in Full) National Organization PAC 000000001			
A. Full Name, Mailing Address and ZIP Code	Payer of Disbursement	Date (month, day, year)	Amount of Cash Disbursement (The Report)
Martin L. Kress 4 River Road City, State ZIP	RAFFLE PRIZE	8/19/84	\$3,888.00 (IN-KIND CONTRIBUTION)
Report for: <input type="checkbox"/> Other receipt <input type="checkbox"/> Primary <input type="checkbox"/> General	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

## Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.6(b).

**EXAMPLE:** During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See Item A in the illustration above.)

## In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See page 8 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.

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